

**FILED**  
HARRISBURG, PA

JUL 16 2024

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAPER *M*  
DEPUTY CLERKShawna Beard  
535 N. Hartley St  
York PA 17404  
(Enter above the full name of  
plaintiff in this action)CIVIL CASE NO: 1:24-CV-1176  
(to be supplied by Clerk  
of the District Court)

v.

White Deer Run  
106 DAVIS Dr  
York PA 17402  
(Enter above the full name of  
the defendant(s) in this action)COMPLAINT

1. The plaintiff Shawna Beard a citizen of  
the County of York State of  
Pennsylvania, residing at 535 N. Hartley St  
wishes to file a complaint under \_\_\_\_\_  
(give Title No. etc.)

2. The defendant is White Deer Run

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper exhibits that give further information of your case, attach them to this completed form. Use as much space as you need. Attach extra sheet(s) if necessary) I Shawna Beard

3. (CONTINUED) who targeted by upper management  
because I <sup>reported</sup> complained and went over their  
head to report illegal use of vehicle  
hostile work environments unfair treatment  
damaged property, stole property  
breached accounts with proof of it  
someone posting on my day off  
being accused of stealing an EZ Pass  
being accused of using a ~~EV~~ Van on my  
day of getting Toll Tickets When I ~~when~~  
checked the dates these were my days off  
Sabotage on a regular basis

4. WHEREFORE, plaintiff prays that \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

  
(Signature of Plaintiff)

I was hired by the above-named Respondent on or about November 10, 2022, as a Transportation Supervisor.

On or about November 2023, I began to experience acts of unfair treatment, and I was subjected to different terms and conditions than my non-black counterparts. I informed human resources about the negative treatment that I was experiencing. Shortly thereafter, I was told by Management (Clark Sparks) that I should just keep my head down because nothing was going to change. It appeared to me that I was being sabotaged and set up by upper management to fail at my job responsibilities by not being provided with the necessary tools to perform my duties. I was the Transportation Coordinator/ Supervisor for over 1 year and yet I was not considered for a job that I was qualified for. My co-worker, who actually did get the position, was not qualified in any transportation job ever. These are her words to me, but because they wanted retaliation against me so bad that they used Raquel Summers as their pawn. Even though she has poor attendance and is late every day, they were willing to accept that before hiring someone with the experience that they asked for in the post for the Transportation Manager position. They hid the facts of Clark leaving his position and put her in place before the ad was posted on 03/07/24 and stated she was directed to say she had management experience to explain how she could get

the position over me (even though management was not a qualification) as she has admitted to me on 04/16/2024 and willing to testify to the facts that they asked her to keep quiet. They then proceeded to post her job as well on 03/07/2024 but did not notice that until later as I was putting the pieces together. When I saw the post I immediately applied once I got to work. When I applied, approximately 15 minutes later I got an alert from Indeed stating my application was rejected, at that time I went back in to see why. That's when a new qualification was added so that I could not qualify. I immediately notified my boss and let him know what just occurred. I have a copy of the two different job posts. I also know that Raquel Summers and Jamie Yox were both from Maryland that went to the same High School and were actually friends. Jamie played along and gave me a fake interview on 03/19/24 because she thought I did not know what was going on but I literally knew all of this before the interview. I suggested because the salary was so low, could I combine my job which is Transportation Supervisor with the new job for a combined salary and she stated we can't combine two positions. I do know that is a lie as well. I know a woman at our company that doubles as a supervisor/ manager Loni Colon BHA Supervisor / House Manager. Another act of retaliation was as a punishment from reporting bad behavior ~~was~~ they wanted me to clock in at another facility with the reason that I am based at that facility but I have been clocking in at another facility that I am stationed at for a whole year and all of a sudden I need to clock in somewhere else. I then decided I will not go back and forth after a 12 hr+ day to clock out. I will just move my office to my base. They did not expect me to do that and gave me 3 different offices and all taken back stating Carla Colflesh said hold off. This woman is blatantly racist, she has accused me of stealing, lying about \$5.00 that was owed to me and abruptly cleared her throat as loud as she possibly could to stop me from what she assumed to be me stealing snacks. I did not acknowledge her ignorant behavior as the kitchen staff yelled thank you to me. She slowly drifted back out the room. She accused me of stealing an EZ PASS threatening to investigate after the holidays. When there are visitors in the building they go office to office introducing staff, they always skip the transportation office. She

They

refuses to allow me the things I need to run a successful department, wanting us to pay for things for this company and say they will reimburse us but 8 out of 10 we never get reimbursed. So I ordered all Transportation to stop paying out of our pockets. Also they have a employee of the month the same people win every month, never has anyone in the transportation department won, and only 1st shift wins the money always. And how can it be fair if the same employees vote from the same department and don't know half the employees. Its a scam I have proof of repeat winner every month. Not long ago I was feeling as if someone was sharing my screen I was posting thing where I did not post, things were being changed after I know what I did at work but I could not prove it, until one day on my day off, I got a call from a Program Director that I have a great relationship with, she knew that was my day off and called to ask me am I at work today, I was not but someone was posting under my accounts even though I just changed my password that day before. When I got back to work that Tuesday I took a picture then I reported it. I was told by IT that it was not an outside Breech but it was an inside breech. When I reported this to Jaime Yox she stated that noone has access but I said then how do you suggest this got posted on my day off with no access from home. She stated she doesn't know well someone has access, the proof is on the screen. Yet no one is worried , but why? As a boss wouldn't that be alarming? I would get no response to important Emails. I was denied Leaving for an appointment when I had FMLA I had a back up to take my place but one program Director Kelly Gearty stated the person I had in place was not a certified driver and has to be added to the insurance. That was a Lie She was an approved driver and what made it bad was no one person ever gets added to the insurance, She doubled down on her first lie just to make it sound official. To be clear She was certified and we don't need our names added to insurance.

I was lied to via text that I needed to take a leave of absence if I miss 3 days of work, I was only out 1 day when I got notice but really who takes a leave for 3 days? This was trying to get me out of the way so they could put someone in his position behind my back. I was told by Carla Colflesh the transportation department could not use the vans to transport but yet everyone else at all the other facilities that I work for are still using them. A toll was issued and immediately they emailed me about this when both tolls were on my days off. Then the issue was dropped and never went any further investigating the issue because it wasn't me, continually trying to sabotage me thinking I'm not going to look at the days because I knew I wasn't using them. They all still use vans and transportation can't. I have proof. I was thrown under the bus by my boss Clark, I had taken two ladies and dropped off at a clothing run. Before I left Lashonda asked me was I staying with them and I said No, if they weren't supposed to be left alone, why continue to let them go? That was the time to say no you have to wait for another time. When I was returning to get them I got a call from my boss saying Kelly (Lashonda's Boss) said they should not have been left alone. I told him she knew I was leaving them. He allowed me to take the blame as I was speaking loudly so they could hear, He started shhhh shhhh ing me trying to get me to be quiet because he told her they need to stick together. I have hours not paid written on some time cards. Still don't know why. My time card was locked on Friday when I work every Saturday. Nobody knows how it happened. Things being stolen, damaged, and medication tampered with in my office. We have a secured building only employees have access to the building and never were they concerned enough to look at the cameras right outside my office. Their suggestion was don't leave anything in the office as opposed to trying to figure out what employee still has an addict mentality.

I believe I have been retaliated and discriminated against because of my race (African American), in violation of Title VII of the Civil Rights Act of 1964, as amended.